

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES, *ex rel.* KRAH PLUNKERT,

Plaintiffs,

v.

MARYLAND BROADBAND COOPERATIVE, *et al.*,

Defendants.

Civ. No. SAG-19-3375

**CONSENT MOTION FOR EXTENTION OF TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS' MOTION TO DISMISS**

Plaintiff/Relator Krah Plunkert, with consent of Defendants Wayne I. Kacher, Jr. ("Mr. Kacher"), Bel Air Underground Services, Inc. ("Bel Air Underground"), and Pro Comm E.L.S., LLC ("Pro Comm"), submits this Motion for Extension of Time for Plaintiff to Respond to the Defendants' Motion to Dismiss and states:

1. Mr. Kacher, Bel Air Underground, and Pro Comm filed a Motion to Dismiss, pursuant to Fed. R. Civ. P. 12(b)(6), with this Court on August 31, 2023.
2. Plaintiff seeks a two-week extension or until Friday, September 29, 2023, to respond to Defendants' motion. Counsel for Mr. Kacher, Bel Air Underground and Pro Comm consent to the requested extension.
3. The proposed extension will not prejudice any party and will not unduly delay development of the case.

WHEREFORE, Plaintiff respectfully requests this Honorable Court grant this Consent Motion for Extension of Time for Plaintiff to Respond to Defendants' Motion to Dismiss, order that Plaintiff has until September 29, 2023 to respond to Defendants' Motion to dismiss and grant Plaintiff such other and further relief as the nature of her cause may warrant.

/s/

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Attorneys for Plaintiff/Relator Krah Plunkert

CERTIFICATE OF SERVICE

This is to certify that, on this 7th day of September 2023, the undersigned filed the foregoing Consent Motion for Extension of Time and proposed Order using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record, and that I mailed via Regular U.S. Postage the foregoing to the following parties who do not have attorneys of records:

W. Patrick Mitchell
7453 Palmer Glen Circle
Sarasota, FL 34240

/s/
Robin R. Cockey (Fed. Bar # 02657)